

Hearing Date/Time: October 23, 2019 at 10 a.m.

Objection Deadline: October 16, 2019 at 4:00 p.m.

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re :
: Chapter 11
SEARS HOLDINGS CORPORATION, *et al.*, :
: Case No. 18-23538 (RDD)
Debtors¹. :
: (Jointly Administered)
-----X

**NOTICE OF HEARING ON AMENDED MOTION OF KELLERMEYER
BERGENSONS SERVICES, LLC AND INNOVATIVE FACILITY SERVICES FOR
ENTRY OF AN ORDER (I) COMPELLING THE DEBTORS TO IMMEDIATELY PAY
POST-PETITION AMOUNTS DUE AND (II) GRANTING RELATED RELIEF**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); Max Serv, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (19870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

PLEASE TAKE NOTICE that a hearing shall be held on **October 23, 2019 at 10:00 a.m.** (the Hearing) before the Honorable Robert D. Drain, United States Bankruptcy Judge, at the United States Courthouse, 300 Quarropas Street, White Plains, New York 10601, to consider the *Amended Motion of Kellermeyer Bergensons Services, LLC and Innovative Facility Services for Entry of an Order (I) Compelling the Debtors to Immediately Pay Post-Petition Amounts Due, and (II) Granting Related Relief* (the Amended Motion).

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief sought in the Amended Motion shall be in writing, state with particularity the basis for the objection, and be filed with the Bankruptcy Court in accordance with the Local Rules of the Bankruptcy Court of the Southern District of New York (the Local Rules) by users of the Bankruptcy Court's case filing system, and by all other parties, on a 3.5 inch disk, with a hard copy to Chambers, and served in accordance with the Local Rules and upon Halperin Battaglia Benzija, LLP, 40 Wall Street, 37th Floor, New York, New York 10005, Attn: Donna H. Lieberman Esq., and Shumaker, Loop & Kendrick, LLP, 1000 Jackson Street, Toledo, Ohio 43604, Attn: David Coyle, Esq., so as to be received no later than **4:00 p.m. on October 16, 2019**. Any such objection shall state with specificity the reason or reasons why the relief sought in the Amended Motion should not be granted.

PLEASE TAKE FURTHER NOTICE that if no objections are timely filed and served, the Court may entered the proposed order for the relief requested in the Amended Motion without further notice or hearing.

Dated: New York, New York
August 22, 2019

HALPERIN BATTAGLIA BENZIJA, LLP

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